

*Excerpt from the Consent Letter for the Lehua Poison Drop, delivered by Ann Garrett, Assistant Regional Administrator, NOAA, Pacific Islands Regional Office (August 21, 2017):*

Because there is no data on the toxicity of diphacinone and brodifacoum on marine mammals, the USFWS used the coyote as a surrogate mammal, which has been found to have the highest toxicity value of any mammal when exposed to diphacinone and brodifacoum. Based on a lethal dose for 50 % of the test animals (LD50) of 0.6 mg/kg and lowest observed effect level (LOAEL) of 0.3 mg/kg for diphacinone in coyotes; an average size 66 kg juvenile monk seal would have to consume 678 kg fish to reach the LD50 level and 338 kg of fish to reach the LOAEL level. A juvenile monk seal consumes about 5.3 kg of food daily. Based on the same level of exposure to diphacinone, an average size, 170 kg adult monk seal would have to consume 1,695 kg fish to reach the LD50 level and 847 kg fish to reach the LOAEL. Adult monk seals consume about 6.8 kg of food daily. A 200 kg juvenile and a

700 kg adult false killer whale, which are averages sizes, would have to consume 2,035 kg, and 7,117 kg of fish contaminated with diphacinone to reach the LD50 level, respectively; and 1,018 kg and 3,559 kg of fish to reach the LOAEL level, respectively. A 200 kg juvenile false killer whale consumes approximately 16 kg of food daily and 700 kg adult consumes approximately 24.5 kg.